

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
WINCHESTER DIVISION**

CRISTOBAL PASCUAL, DAVID)	
JIMENEZ, and OSCAR PARRA, on behalf)	
of themselves and all similarly situated)	
individuals)	COLLECTIVE ACTION
)	
<i>Plaintiffs,</i>)	CASE NO. 4:14-cv-00008
)	
v.)	Judge Harry S. Mattice, Jr.
)	Magistrate Judge Susan K. Lee
CORSICANA BEDDING, INC.,)	
)	
<i>Defendant.</i>)	

(PROPOSED) ORDER

This case is before the Court on the parties' Joint Motion for Conditional Certification of a Collective Action and Court-Supervised Notice to Class Members Pursuant to 29 U.S.C. § 216(b) ("Motion"). (ECF No. 25).

The Motion is hereby GRANTED, consistent with the terms of this Order. Specifically, the Court ORDERS as follows:

1. The Court conditionally certifies a class in this action consisting of all individuals employed by Corsicana Bedding, Inc. as piece rate employees at its Shelbyville, Tennessee mattress factory at any time from February 3, 2011, to the present (the "Conditional Class").
2. The Collective Action Notice and Notice of Consent Forms, attached to the Motion as Exhibits A and B, are hereby authorized for distribution to the Conditional Class.
3. Within fourteen (14) days of the entry of this Order, Defendant's counsel shall provide the Plaintiffs' counsel with the names and last known addresses of the employees who

fall within the Conditional Class described in Paragraph 1 of this Order. Also within 14 days of the entry of this Order, Defendant's counsel shall provide counsel for the Plaintiffs with the number of currently employed individuals who fall within the Conditional Class definition.

4. Within seven (7) days after Defendant's counsel provides the information specified in paragraph 3 of this Order, Plaintiffs' counsel, or a qualified third party at the Plaintiffs' discretion, shall distribute, via U.S. Mail, the Court-Authorized Collective Action Notice, in a single distribution. Each Notice shall be accompanied by the Consent Form and a self-addressed stamped return envelope. Each of these documents shall be provided in both English and Spanish. No other information or material shall accompany the Notice, and the parties shall not use any other written communication or any other method of communication to notify putative class members regarding this action and their right to join this action. Plaintiffs shall bear all costs associated with distributing the Notice and accompanying material in this manner.

5. No later than seven (7) days after the Notice has been sent out via U.S. Mail, counsel for Plaintiffs shall file a certification with the Court, certifying that the Notice has been mailed to the prospective members of the Conditional Class consistent with this Agreed Order and identifying the date of mailing.

6. All Notice of Consent Forms shall be postmarked no later than forty-five (45) days from the date of mailing. No Notice of Consent Forms postmarked after forty-five (45) days from the date of mailing may be filed without the written consent of all parties. To be effective, the completed and signed Consent Form must be filed with the Court, and the filing date controls with regard to the determination of any applicable statute of limitations period.

7. Nothing in this Order limits Defendant's ability to file a motion for decertification or to contest any issues regarding the merits of the Plaintiffs' claims, including any alleged violation or alleged willful violation of the Fair Labor Standards Act and the applicable limitations period.

IT IS SO ORDERED.

U.S. DISTRICT JUDGE HARRY S. MATTICE